



The Chemical Company

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Hazardous Waste Program  
MO Dept. of Natural Resources

May 12, 2011

Kathy Flippin  
Enforcement Section Chief  
Hazardous Waste Program  
Missouri Department of Natural Resources  
1730 East Elm Street  
Jefferson City, MO 65101

Dear Ms. Flippin:

This is to notify the Department that a release of treated aqueous wastewater from a leak in an above ground surge tank for the effluent system occurred at the Hannibal Site on Tuesday, May 10, 2011. Approximately 7322 pounds of low pH effluent aqueous wastewater was released to the ground. Normally, this effluent is discharged under the site's NPDES permit when pH is within permitted ranges, but is redirected to the surge tank when effluent pH needs adjustment to meet permitted range.

The treated aqueous wastewater consists primarily of blowdown from the site's hazardous waste incinerators, which treat listed hazardous waste. This makes a spill of the treated aqueous wastewater a hazardous waste release, because it is derived from the treatment of listed hazardous wastes. This written submittal is for MDNR Incident No. 110510-0811-ADC, verbally reported to the MDNR Environmental Emergency Response Center the morning of the release discovery.

It is believed this leak occurred due to corrosion of this tank when low pH effluent collected in the tank. The actual tank leak is believed to have occurred approximately between 5:51 a.m. and 6:51 a.m. on May 9, but evidence of the leak was not discovered until 7:45 a.m. on May 10. Upon discovery that a leak had occurred, operations isolated the surge tank from the effluent system to avoid any further leaks. Surface gravel and soil impacted by the release were removed and collected in a roll off. This material will be sent to a hazardous waste landfill.

The spilled liquid remained entirely on BASF property. While the released treated aqueous wastewater mostly consisted of water with a small amount of inorganic salts, the release amount exceeded the Reportable Quantity for material derived from the treatment of listed hazardous waste, making it a reportable release. The pH was lower than usual for effluent typically sent to this surge tank because of a pH monitoring instrumentation issue that is currently under investigation.

BASF Corporation  
Hannibal Site  
3150 Highway JJ  
Palmyra, MO 63461  
Tel: (573) 769-8500

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May 12, 2011

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If you have any questions with regard to this submittal or require any additional information, please contact me at (573) 769-8684 or at the mailing address included at the bottom of this letter.

Sincerely,

BASF Corporation  
Hannibal Site

A handwritten signature in cursive script that reads "Curt Gardner".

Curt Gardner  
Senior EHS Specialist

cc: Richard Nussbaum, MDNR  
Irene Crawford, Director, MDNR NERO  
Dr. Mike McFarlane  
Marion/Ralls County Coordinator's Office



**Re: BASF Release - 05/10/2011** 

Ken Herstowski to: Dandurand, Mike, Edwin Buckner

Cc: "Groner, Darleen", Patricia Murrow

05/18/2011 09:22 AM

I'm curious about the "pH monitoring instrumentation issue that is currently under investigation." pH of the scrubber is an important operating parameter limit for acid gas control.

minimum pH in the NOC is:

6.7 A/B units

6.79 C unit

6.56 D unit

i wouldn't think there would be abnormal corrosion at those levels

Ken Herstowski  
EPA Region 7  
AWMD/RCAP  
901 N. 5th St.  
Kansas City, KS 66101  
9135517631  
9135517947(fax)

"Dandurand, Mike"

Attached is a copy of the BASF release report. ...

05/18/2011 09:02:02 AM

From: "Dandurand, Mike" <mike.dandurand@dnr.mo.gov>  
To: Patricia Murrow/R7/USEPA/US@EPA  
Cc: Ken Herstowski/R7/USEPA/US@EPA, "Groner, Darleen" <darleen.groner@dnr.mo.gov>  
Date: 05/18/2011 09:02 AM  
Subject: BASF Release - 05/10/2011

Attached is a copy of the BASF release report. It was of *treated aqueous wastewater* from one of their tanks. Not sure if it is one of the 'exempt wastewater tanks' or not. EPA was not copied on this letter. Pat, let me know what you would like to do with this one. I will be speaking with out inspector to find out when she is going to BASF next and have her look at the manifests and try to document exactly which tank it was released from.

Thanks

Mike Dandurand  
Environmental Engineer  
Missouri Department of Natural Resources  
Hazardous Waste Program, Permits Section  
Ph: 573-751-3335  
Fax: 573-526-5268  
mike.dandurand@dnr.mo.gov



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